

# Data protection notice for the applicant management process at Bosch Group

#### We want you on our team!

In this privacy notice, we inform you how your personal data is processed in the applicant management process at Bosch Group (in the following also "Bosch" or "we"/"us"). Additionally, we inform you about your rights under applicable data privacy laws.

## **Bosch respects your privacy**

Protecting your personal data and ensuring the security of all our business data are important concerns for us. We always consider these concerns in our business processes. The personal data is treated confidentially and strictly in accordance with the statutory provisions.

Data privacy and information security are an integral part of our corporate policy.

#### Data controller

The Bosch Group legal entity to which you submit your application using the application management system is responsible for processing your data. You will find the contact details of the controller in the job advertisement in the application management system.

# **Data categories processed**

The following are the main categories of personal data processed:

- Master data (e.g. name, date of birth, nationality, place of residence)
- Data from submitted documents (e.g. references, certificates, résumés)
- Education and training details (e.g. data about school education, university, professional qualification)
- Payment data (e.g. bank account details for travel expenses)
- Organizational data in case of internal applications (e.g. personnel number, cost center, department)
- Communication data (e.g. e-mail address, mobile/ phone number, IT user ID in case of internal applications)
- Audio visual recording in the selection process e.g. for the Junior Managers Program (JMP)
- Log data recorded while using IT systems

These may also include special categories of personal data as per Art. 9 para. 1 GDPR such as health data or religion or trade union membership.

### Purposes of processing and legal bases

We process your personal data in compliance with the EU's General Data Privacy Regulation (GDPR), with the national data privacy laws and with any other applicable national regulations.

The personal data processing takes place during the applicant management process particularly for the purpose of preparation for an employment relationship with a legal entity of the Bosch Group. The legal basis for this purpose is Art. 6 para. 1 (b) GDPR ("in order to take steps at the request of the data subject prior to entering into a working contract").

Other applicable legal bases are:

- Consent under Art. 6 para. 1 (a) GDPR (e.g. for Bosch applicant community as part of the applicant management system or for reviewing your application for other open positions).
- Legitimate interest under Art. 6 para. 1(f) GDPR (e.g. HR evaluations like personal controlling, analytical reporting). We will always gently balance our legitimate interests in the organisation



of our business against your interest in protecting your personal data in accordance with the statutory provisions. In order to carry out the application process efficiently, we match your qualifications with the requirements of the respective position using artificial intelligence and calculate the suitability level from this. Automated decision-making is not associated with this.

Whenever special categories of personal data are processed processed (e.g. health data, religion or union membership), this processing is carried out on the legal basis of Art. 9 para. 2 (b) GDPR (fulfilment of obligations in the field of labour law and social security law) or Art. 9 para. 2 (h) GDPR (if it is necessary to process your health data in order to assess your ability to work).

#### Children

This applicant management platform is not meant for children under 16 years of age.

## **Collecting of personal data**

As a rule, your personal data is collected directly from you during the hiring process.

The easiest way to apply for a job at Bosch is a direct application for a position advertised on one of our job portals, where you enter your data in the candidate profile created individually for the advertised position. You hereby have the possibility to send us the data by connecting to a social network, by a manual input and/or by using "CV Parsing" (transferring some data from your CV to our job portal).

We recommend to only upload documents in pdf format. Due to technical reasons other data formats lead to temporary local data copies in order to be displayed.

The data from paper applications is transferred manually to the application system. You receive an email in order for you to activate your manually created application. In this email, we inform you, whether we will send your paper application back or shred it. If you do not activate your application within 30 days, your data is deleted from our application management system and you will not be considered any further in the selection process.

Additionally, you have the possibility to be referred by a Bosch Group employee. For this purpose, you need to give your application documents to this employee, who then uploads it in the application management system. You receive an email with which you can activate your application. If you do not activate your application within 30 days, your data is deleted from our application management system and you will no longer be considered in the selection process. Your application is linked with the employee who uploaded it in the application system. This helps us identify that this employee has referred you. Furthermore, this employee can track the status of your application (invitation, rejection etc.) on an overview page but has no access to the details of the application process.

We keep you up to date on the status of your application via e-mail.

Prior to sending your application, you have the possibility to you give your consent for allowing your profile to be shared with further hiring managers or recruiters that offer open positions.

During the application process, we will ask you whether we are allowed to forward your application data to other suitable open positions. If applicable, we may also offer you membership in a Bosch applicant community.

Staffing of particularly sensitive job positions may require a further check of your application data and your career path. The result of this check is documented in the application management system. We



inform you about such checks in a transparent manner in the framework of our job advertisements. This check takes place taking local legal requirements into consideration and by involving carefully selected service providers.

# Membership in a Bosch Candidate Pool

Bosch Group offers certain target groups the opportunity to register in a Bosch Candidate Pool. Bosch Candidate Pools have the purpose of checking profiles and CVs for placement to a specific open position or to a Bosch Talent Community within our Active Sourcing Tool TalentStation. Recruiters contact the respective candidates by e-mail (e.g. to send out suitable job proposals) or by phone (e.g. to check for professional preferences).

Before you become a member of a Bosch Candidate Pool, you consent to the processing of your personal data over a consent form. Your membership is limited to maximum duration of 2 years. After that, your data will be deleted.

You can revoke your consent at any time for the future by contacting the HR IT Support Germany: <a href="mailto:SupportDeutschland.HRIT@de.bosch.com">SupportDeutschland.HRIT@de.bosch.com</a>.

# **Participation in Bosch recruiting events**

Some Bosch locations organize Recruiting-Events in order to win potential candidates for multiple, similar job advertisement. Special event pages on different internet platforms inform about the contents of these events. You may apply for participation in these events by uploading your application in our application system via the link created for this purpose.

# Recipients of your personal data

## Within the respective legal entity of the Bosch

Only the people involved in the application process (e.g. line managers and associates of the recruiting department, HR associates and associate representatives) have access to your personal data for the purposes mentioned above within the legal entity of the Bosch Group to which you have applied.

## Other legal entities within the Bosch Group

Other legal entities are data controllers themselves. The above-mentioned persons involved in the recruiting process may belong to different companies of the Bosch Group. Therefore, your data may be transferred to the respective persons worldwide within the Bosch Group.

In case of your appointment, your data is transferred from our application management system to our HR-administration systems. In this process, your data may be transferred to a different legal entity and will thereafter be processed as employee data. An exchange of your personal data with other legal entities within the Bosch Group takes place especially in order to fulfil the contracts as well as due to our legitimate interest to organize the internal workflows (e.g. shared services, execution of transfers or relocations across legal entities).

## Recipients outside the Bosch Group

We may disclose your personal data to other data controller only if necessary for the application, if the third party or we have a legitimate interest in this disclosure, or if you have provided your consent. You will find the details of the legal bases in the section "Purposes of processing and legal bases".

## Data processors



In addition, we use service providers to fulfil our contractual and legal obligations among other things. Insofar as these service providers processes personal data on our behalf, we have concluded the contracts required under the data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Bosch Group. You will find a list of our contractors and service providers (with whom we have a long-term or ongoing business relationship) in Annex 1.

## Transfer to recipients outside the European Economic Area

We might transfer personal data to recipients outside of the European Economic Area (EEA). In such case prior to the transfer, we ensure that either the respective country provides an appropriate level of data protection due to a decision of adequacy by the European Commission, or due to other appropriate safeguards (e.g. binding corporate rules on data protection or EU standard contractual clauses), or a legal basis authorises the transfer. You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection. For this purpose, please contact the Controller mentioned above.

Should a transfer to recipients outside the EEA (e.g. authorities, courts, parties of a lawsuit or advisors) be necessary for the enforcement/exercise of or defence against legal claims, this shall be done in accordance with Art. 49 para. 1 (e) GDPR. On request we will provide you with an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection (see "Contact information" below).

# **Duration of storage**

Principally, we store your data for as long as it is necessary for the purposes for which they were collected or processed or for as long as we have a legitimate interest in storing the data. In all other cases, we delete your personal data with the exception of data we are obliged to store for the fulfilment of legal obligations.

After conclusion of the application process (e.g. by rejection from our side or withdrawal from your side) we will delete your personal data in general within 6 months.

### **Cookies**

As part of our online services, we use cookies, or similar tracking mechanisms. We distinguish between cookies that are mandatorily required for the technical functions of the online service and such cookies and tracking mechanisms that are not mandatorily required for the technical function of the online service.

It is generally possible to use the online service without any cookies that serve non-technical purposes.

# Technically required cookies

By technically required cookies we mean cookies without those the technical provision of the online service cannot be ensured. These include e.g. cookies that store data to ensure smooth reproduction of video or audio footage.

Such cookies will be deleted when you leave the website.



# - Marketing cookies and tracking mechanisms

By using marketing cookies and tracking mechanisms we and our partners are able to show you offerings based on your interests, resulting from an analysis of your user behavior:

#### Statistics:

By using statistical tools, we measure e.g. the number of your page views.

## - Conversion tracking:

Our conversion tracking partners place a cookie on your computer ("conversion cookie") if you accessed our website via an advertisement of the respective partner. Normally these cookies are no longer valid after 30 days. If you visit certain pages of our website and the cookie has not yet expired, we and the relevant conversion partner can recognize that a certain user clicked on the advertisement and thereby was redirected to our website. This can also be done across multiple devices. The information obtained by means of the conversion cookie serves the purpose of compiling conversion statistics and recording the total number of users who clicked on the respective advertisement and were redirected to a website with a conversion tracking tag.

## - Social plugins:

Some of the pages of our online service involve content and services of other providers (e.g. Facebook, Twitter) which also may use cookies and active modules.

### Retargeting:

These tools create user profiles by means of advertising cookies or third-party advertising cookies so called "web beacons" (invisible graphics that are also called pixels or tracking pixels), or by means of comparable technologies. These are used for interest-based advertising and to control the frequency with which the user looks at certain advertisements. The relevant provider is the controller responsible for the processing of data in connection with the tool. The providers of the tools might disclose information also to third parties for the purposes mentioned above. Please note the data protection notices of the relevant provider in this context.

Please note that using the tools might include transfer of your data to recipients outside of the EEA where there is no adequate level of data protection pursuant to the GDPR (e.g. the USA). For more details in this respect please refer to the following description of the individual marketing tools:

#### Google Analytics

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland Function: Analysis of user behavior (page retrievals, number of visitors and visits, downloads), creation of pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrichment of pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking and retargeting in conjunction with Google Ads

# Google Tag Manager

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland Function: Administration of website tags via a user interface, integration of program codes on our websites



## Security during data processing

We take all the necessary technical and organizational measures to ensure appropriate level of security and to protect your personal data particularly from the risks of unintended or unlawful destruction, manipulation, loss, alteration, or disclosure to or access by unauthorized third parties. We are constantly trying to improve our security measures and keep them state of the art.

## **Your Rights**

To enforce your rights, please use the information in the section "Contact information of the data protection officer" below. Please make sure that we can unambiguously identify you.

### Right to information and access

You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

## Right to correction and deletion

You have the right to obtain the rectification of inaccurate personal data. As far as statutory requirements are fulfilled you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

## Restriction of processing

If the legal requirements are fulfilled, you can demand that we restrict the processing of your data.

## Objection to data processing

You have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate interest according to legal requirements which override your rights.

## Withdrawal of consent

In case you consented to the processing of your data, you have the right to withdraw this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

## Data portability

If the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or – if technically feasible – to request that the data be transmitted to a third party.

# Right to lodge complaint with supervisory authority

You have the right to lodge a complaint with a supervisory authority regarding the processing of your personal data. You can appeal to the supervisory authority, which is responsible for your place of residency or to the supervisory authority responsible for us.

The supervisory authority responsible for the Bosch Group is the "Landesbeauftragte für den Datenschutz und die Informationsfreiheit in Baden Wuerttemberg".

Contact details of the supervisory authority: Office address: Lautenschlagerstraße 20



70173 Stuttgart, GERMANY Postal address: P.O. Box 10 29 32 70025 Stuttgart, GERMANY

Phone: +49 (711)/615541-0 Fax: +49 (711)/615541-15 Email: poststelle@lfdi.bwl.de

# Contact information of the data protection officer

You can reach our data protection officer under:

Information Security and Privacy (C/ISP) Robert Bosch GmbH Postbox: 30 02 20 70442 Stuttgart GERMANY

E-Mail: <a href="mailto:DPO@bosch.com">DPO@bosch.com</a>

To assert your rights please use the following link: <a href="https://request.privacy-bosch.com/lang/en-GB/">https://request.privacy-bosch.com/lang/en-GB/</a>.

Should the legal entity to which your request refers not be selectable on the linked page, or to notify a data protection incident please use the following link: <a href="https://www.bkms-system.net/bosch-dataprotection">https://www.bkms-system.net/bosch-dataprotection</a>

## **Adjustments to the Data Protection Notice**

We reserve the right to adjust our security and data protection measures. In such cases, we will amend our data protection notice accordingly. Please, therefore, notice the current version of our data protection notice in the job advertisement.

Effective date: August 2024



Anex 1: list of contractors and service providers

Service Provider	Processing
SmartRecruiters GmbH Dircksenstrasse 47 10178 Berlin, Germany SmartRecruiters SP. Z o.o. Fabryczna 20, 31-553 Kraków, Poland SmartRecruiters Inc. 225 Bush Street, San Francisco, CA 94104, USA	Provision and development of the cloud platform ("Software as a Service") for the above mentioned purposes.  Processing of the provided personal data.
Signum GmbH Rungestrasse 19 10179 Berlin, Germany	Processing of the personal data for career path check.
Amazon Web Services Inc. 10 Terry Avenue North Seattle, WA 98109-5210, USA	Provision and operation of the technical infrastructure for the cloud platform ("Platform as a Service").
Mailgun Technologies, Inc. 112 East Pecan Street Suite 1135 San Antonio, TX 78205, USA	Processing of the generated email communication between Bosch and the applicant.
Text Kernel BV Nieuwendammerkade 28A17 Amsterdam, Noord-Holland 1022 AB, The Netherlands	Provision, operation and further development of the application to import the data from CVs (CV-Parsing).
Profesia, spol. s r.o. Pribinova 19 811 09 Bratislava Slovenská republika	Cooperation in the selection of employees.